

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

FILED

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CLERK US DISTRICT COURT
NORTHERN DISTRICT OF OHIO
YOUNGSTOWN

Bobby Ojose, Plaintiff)

18721 Rochelle Ave)

Cerritos, CA 90703)

-vs-)

Youngstown State University, Defendant)

1 University Plaza)

Youngstown, OH 44555)

CASE No. 4:16 CV 2952

JUDGE JUDGE PEARSON
MAG. JUDGE BURKE

COMPLAINT FOR RACIAL DISCRIMINATION

I was hired by the Defendant in July of 2013 as an Assistant Professor for the Department of Teacher Education. In May of 2015, I received a performance appraisal and rating by the chair of the department, Dr. Marcia Matanin (White) that was lower than similarly situated White co-professors including Dr. Cripe, Dr. Saunders-Smith, Dr. List, Dr. Ratican and Dr. LaVine. Despite the fact that my teaching was at the same level and in some instances superior to those of White professors, I was rated lower while ALL White professors were rated higher. For example, in the appraisal period, my teaching records indicate that I had success rate of 92% in the course TEMC 3702 (Spring 2014), 100% success rate in the course ECE 3713 (Spring 2014), 100% success rate in the course SED 4800M (Fall 2015), 91% success rate in the course TEMC 3704 (Fall 2014), and 83% success rate in the course ECE (Fall 2014). When these numbers are compared to those of White professors, they are either at the same level or better than those of white professors. Yet all White professor got rating of satisfactory or better while I was rated "weak." Sometime in September or October of 2015, I demanded that the chair and University looked at the disparity and to correct the situation. Actions taken by the University did not resolve the matter. I had to resign my appointment in May 2016 as an Assistant Professor because of the inability of the University to see the racial discrimination being perpetrated against me because I am a Black man. It is also important to mention that of the 7 professors that were evaluated in this period,

all five White professor got rating of satisfactory or better in teaching while the two Black professors got rating of "weak" or lower. I believe I have been discriminated against because of my race, Black, in violation of Title VII of the Civil Rights Act of 1964, as amended (Title VII). I hereby ask the court to award me the sum of \$500,000.00 (Five Hundred Thousand Dollars). Breakdown of damages is as follow: \$250,000 for the tuition money for my 4 children if they were to attend the college, \$150, 000 for salary of 3 years until I get a job, and \$100,000 for pain and suffering.



Bobby Ojose

Date: 12/7/16

18721 Rochelle Ave
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